

By: /s/ Alexandra Chase
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AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

MICHAEL DOLCE

Case No.

23-mj-8161-WM

Defendant(s)

FILED BY SW D.C.

Mar 24, 2023

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - WPB

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 15, 2023 in the county of Palm Beach in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 USC 2252A(a)(5)(B) and (b)(2)

Possession of child pornography involving a prepubescent minor and a minor
who had not attained twelve years of age

This criminal complaint is based on these facts:

Please see the attached affidavit of Special Agent Gennady Julien, Federal Bureau of Investigation ("FBI"), which is
incorporated herein by reference.

☒ Continued on the attached sheet.

Sworn and attested to me by
applicant by telephone (FaceTime) per
the requirements of Fed. R. Crim. P.
4(d) and 4.1



Complainant's signature

FBI Special Agent Gennady Julien

Printed name and title

Date: March 24, 2023

City and state: West Palm Beach, Florida



Judge's signature

Hon. William Matthewman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Gennady Julien (the Affiant), been duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed since 2019. I am currently assigned to the Violent Crime Squad, and my duties include investigating violations of federal law. As part of my duties, I investigate crimes involving the sexual exploitation of minors including the production, possession, and distribution of child pornography. In that time, I have become familiar with the methods and means used by individuals engaging in violent crimes such as online sexual exploitation of children. I have conducted and assisted in several child exploitation investigations and have executed search warrants that have led to seizures of child pornography. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in many forms of media. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. § 2250 and 2252A, and I am authorized by law to request a search warrant.

2. In this capacity, I have investigated child exploitation and internet crimes against children cases. I have participated in investigations of persons suspected of violating federal child pornography laws. These investigations have included the use of surveillance techniques, undercover activities, the interviewing of subjects and witnesses, and the planning and execution of arrest, search, and seizure warrants. In the course of these investigations, I have reviewed still images and videos containing child pornography and images depicting minor children engaged in sexually explicit conduct on all forms of electronic media including computers, digital cameras, and wireless telephones, and have discussed and reviewed these materials with other law

enforcement officers. I have also participated in training programs for the investigation and enforcement of federal child pornography laws relating to the use of computers for receiving, transmitting, and storing child pornography. In addition, I have received training in the field of computer crimes and Internet crimes investigations.

3. The facts set forth in this affidavit are based upon my personal knowledge; information obtained from others involved in this investigation, including other law enforcement officers; my review of documents; and information gained through training and experience. Since this affidavit is being submitted for the limited purpose of establishing probable cause to support a Criminal Complaint, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only those facts I believe are necessary to establish probable cause to believe that on or about March 15, 2023, MICHAEL DOLCE (hereinafter referred to as "DOLCE") violated 18 U.S.C. § 2252A(a)(5)(B) and (b)(2) (possession of child pornography involving a prepubescent minor and a minor who has not attained twelve years of age).

4. On the evening of March 15, 2023, personnel from the Federal Bureau of Investigation executed three federal search warrants issued in the Southern District of Florida for MICHAEL DOLCE, date of birth 1969; his vehicle; and his residence in West Palm Beach, Florida, 33401. Entry into the residence occurred as a result of a forceful breach on the door when DOLCE did not respond to commands by law enforcement to come to the door. Tactical surveillance and entry teams revealed that DOLCE was alone in the residence, awake on a bed at the time FBI personnel first knocked and announced at his door. Located directly adjacent to DOLCE on the bed was a Samsung laptop (SAMSUNG).

5. The SAMSUNG was found unlocked with multiple open windows and tabs, all of which were in the user account "MICHA" registered to "Michael Dolce". One window featured a

desktop panel, with a background image featuring a female between the approximate ages of sixteen (16) and twenty-five (25) being vaginally and anally penetrated by two separate adult males. Another window featured the Microsoft Edge browser with an “in private”¹ window on a Google image search page for the search term “keep calm fuck”. The browser page displayed several images parodying the popular “keep calm and carry on” phrase, including, “keep calm and fuck me.”

6. The SAMSUNG had an additional window open in Microsoft Edge browser for a website called “www.btmet.com”. Within the search function of the website there was a visible search query for “ls studio collection”, as well as a series of video results which appeared to be playable online. “Ls studio collection” is part of the Ls series of images and videos, which commonly display both child erotica and child pornography featuring predominantly prepubescent females.

7. Additionally open in a tab on the SAMSUNG was a program called “uTorrent”. UTorrent is a program that allows a user to download media files from the BitTorrent peer to peer network. Downloads through BitTorrent network allow a user to download large quantities of media files both anonymously and without payment to a vendor or intellectual property owner. Visible within the uTorrent window were several downloads of groups of files, at least nine (9) of which referenced the Ls series in the title. These included –

- Name: LS Studio Collection – Other LS Issues Part A
Size: 7.85 GB
- Name: LS Models Essentials – Batch A
Size: 8.83 GB

¹ “In Private” windows are a browser function which allow a user to browse the internet without retaining a cache or URL history.

8. Open on the SAMSUNG was a folder, file path – C:/NewFolder(4)/LS Models Essentials – Batch A/LS-Finder-56/previews/ukrangle-0. Immediately visible via large thumbnail icons were several dozen images of prepubescent females in varying states of undress. Many of the files appeared to be child erotica, meaning they featured prepubescent children in sexualized poses in varying states of undress with their genitalia concealed or angled away from the camera. There were also clearly visible within the folder multiple images that constituted child pornography, wherein images of pre-pubescent females displayed both their pubic region and genitalia. Several files were visible on the computer at the time of the warrant execution, and were later seized by FBI forensic examiners, including the following:

- Name: ukranglp033.jpg
Description: Image features a prepubescent female, approximate apparent age between nine (9) and eleven (11) years old wearing only a long sleeve shirt. The prepubescent female is displayed standing facing the camera, and pulling the shirt up exposing her naked genitalia, pubic region, and belly.
Hash SHA-1: 71F00079D1BD968E331049DD68D8470842A3AABE
- Name: ukranglp053
Description: Image features a prepubescent female, approximate apparent age between nine (9) and eleven (11) years old. The prepubescent female is standing nude facing the camera holding see through cloth over her chest and arching her back while displaying her vagina towards the camera.
Hash SHA-1: 142B868FC43577CAA6D99FF1E29EB1D5D17B5DCA

9. Also open on the SAMSUNG was a folder titled “New Folder (5)”. “New Folder (5)” contained within it nine (9) additional sub-folders. All sub-folders contained sexualized media featuring prepubescent children. Four (4) of the nine (9) sub-folders in “New Folder (5)” contained predominately or exclusively child pornography featuring prepubescent females displaying their genitalia in a lewd or lascivious manner. One sub-folder, titled “sweetie”, featured an addition sub-folder titled “Sweet-Pedo Stars”, which featured child erotica and child

pornography images of a single prepubescent minor female victim with the added watermark “PEDO STARS”. Your affiant knows this phrase to be shorthand for “Pedophile Stars”, a reference to children featured in child pornography.

10. FBI digital forensic examiners and filter teams conducted a review of the SAMSUNG. As of 3/24/23, FBI personnel had identified one-thousand nine-hundred ninety-seven images and five videos of child pornography based upon known hash values for previously identified child pornography. These included the following:


- Hash: 59EDCFC3DE305281B12BCE4032B56ECB
Description: Image features a prepubescent female, approximate apparent age between five (5) and eight (8) years old, wearing a bonnet, a wedding leg garter, and sucking on a pacifier. The prepubescent female is sitting with her legs spread, exposing her apparently wet genitals and pubic region to the camera.
- Hash: 020E3B05C175E6D3A52750C824E39E91
Description: Image features an up-close shot of the vagina of a pre-pubescent girl, apparent approximate age between six (6) and ten (10) years old. The prepubescent girl appears to be pushing a lollipop into her vagina.

11. FBI forensic examiners additionally extracted transfer data from the uTorrent program. Data recovered from uTorrent indicated that a download for “LS Models Essentials – Batch A.torrent”, which bears the same title as the file set visible being actively downloaded on uTorrent when law enforcement entered the premises, and whose sub-folder “ukrangl-0” was open and visible on the SAMSUNG at the same time, indicated that downloads for those files began at 5:31 p.m. on 03/15/2023, and were stopped at 9:20 p.m. on 03/15/2023.

12. Based upon the foregoing facts, and my training and experience, I submit that there is probable cause to believe that on or about March 15, 2023, Michael Dolce violated 18 U.S.C. §

2252A(a)(5)(B) and (b)(2) (possession of child pornography involving a prepubescent minor and a minor who has not attained twelve years of age).

Respectfully submitted,



GENNADY JULIEN
Special Agent, Federal Bureau of Investigation

Sworn and Attested to me by Applicant by Telephone (FaceTime) per Fed. R. Crim. P. 4(d) and 4.1. on March 24th, 2023.



HON. WILLIAM MATTHEWMAN
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MICHAEL DOLCE

Case No: 23-mj-8161-WM

Count #1:

Possession of child pornography

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

* **Max. Term of Imprisonment:** 20 years

* **Mandatory Min. Term of Imprisonment (if applicable):** N/A

* **Max. Supervised Release:** Life (mandatory minimum term of five years)

* **Max. Fine:** \$250,000 fine and a \$5,000 special assessment

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**